

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SOFIA RECA and JAMES K. SUPPLES,  
Individually and on Behalf of All Others  
Similarly Situated,

Plaintiff,

Civ. No. 1:24-cv-06316-GHW-SLC

- against -

FLASHDOT LIMITED f/k/a PHOENIXFIN LIMITED, MEK GLOBAL LIMITED, PEKEN GLOBAL LIMITED, and PHOENIXFIN PRIVATE LIMITED (collectively d/b/a KUCOIN), CHUN (a/k/a “MICHAEL”) GAN, KE (a/k/a “ERIC”) TANG, and CHAINALYSIS, INC.,

Defendants.

**NOTICE OF DEFENDANT CHAINALYSIS INC.'S  
MOTION TO DISMISS THE AMENDED COMPLAINT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, dated July 29, 2025, Defendant Chainalysis Inc. (“Chainalysis”) will move this Court, before the Honorable Gregory H. Woods, at the United States Courthouse, Courtroom 12C, 500 Pearl Street, New York, New York, on a date and time to be determined by the Court, for an Order dismissing with prejudice Plaintiffs’ Amended Complaint against Chainalysis, and granting such other and further relief as this Court may deem just and proper.

Pursuant to the Court's April 23, 2025 Order (ECF 56), Plaintiffs' opposition will be due on August 29, 2025, and Chainalysis's reply will be due on September 15, 2025.

Dated: New York, New York  
July 29, 2025

/s/ Alexander C. Drylewski  
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